

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUÑIZ,  
MARCUS MARTIN, NATALIE ROMERO,  
CHELSEA ALVARADO, JOHN DOE, and  
THOMAS BAKER,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**JURY TRIAL DEMANDED**

**MOTION FOR *PRO HAC VICE* ADMISSION OF ALLEGRA K. FLAMM**

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding hereby moves the Court for the admission of Allegra K. Flamm, Esquire to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof states as follows:

1. Ms. Flamm is an associate with the law firm of Cooley LLP, 1299 Pennsylvania Avenue, N.W., Suite 700, Washington, DC 20004 (Tel: 202.842.7800, Fax: 202.842.7899, Email: aflamm@cooley.com).

2. Ms. Flamm is qualified and licensed to practice law and is a bar member in good standing in the District of Columbia (Bar ID No. 1618061 – since January 29, 2019). She is also a bar member in good standing with the United States District Court for the District of Columbia since July 6, 2020.

3. Ms. Flamm agrees to submit and comply with the appropriate rules of procedure as required in the case for which she is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Allegra K. Flamm, Esq. to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: October 1, 2021

Respectfully submitted,

/s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

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*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further certify that on October 1, 2021, I also served the foregoing upon following non-ECF *pro se* defendants and participants, via electronic mail or First Class U.S. Mail, as follows:

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### **VIA U.S. Mail**

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/s/ Robert T. Cahill  
Robert T. Cahill